

I am writing today in opposition to the current plans to deploy BPL as an addition option for Internet access. My comments are based on my membership in the following groups:

- 1) Licensed Amateur Radio operator Call sign: NK9R
- 2) Data communications professional: Sr. Network Engineer/ Worldspan L.P.
- 3) Rural landowner

There have been many comments already submitted to the commission that point out the great potential for interference to existing HF radio users. There is no need for me to add my comments on that subject except to say that I oppose any deployment of BPL that does not protect current and future use of the HF radio spectrum. Once deployed, it will be virtually impossible to undo the harmful effects that PBL, in its present form, will generate.

I am equally concerned from the perspective of a Network Engineer and current rural landowner. As a networking professional, I recognize the need for high-speed Internet access in presently un and underserved rural areas. Currently, high-speed Internet access is principally available only in urban areas. In those areas, there is at least one of two competing systems for high-speed access, DSL and broadband cable. Most urban customers have at least one of these services and increasingly both services in which to choose between. A third, competing option is not a great advantage to an already covered urban and suburban market. In rural America, that is not the case. The cost of deployment, and the low density of the potential customer base in rural areas, has contributed to vast areas of rural America without any form of high-speed Internet access.

On the surface, it would seem that BPL over the existing power line infrastructure, would be a positive step in providing high-speed access in rural areas. Yet, the same argument holds true for DSL over existing telephone wires. Both systems would require investment in additional equipment in order to offer high-speed services to existing rural customers. By encouraging both systems in rural areas, the potential customer base is effectively split in half, reducing the payback potential of either investment. This could delay the availability of high-speed access or cause it to not be deployed at all, in low-density markets. The economics of deployment need to be considered.

As a data communications professional, I do not see BPL and DSL as equal solutions to high-speed access. DSL, as presently deployed, is more immune to interference from outside sources, and causes much less interference than BPL. BPL, as a system does not offer any advantages over DSL either in speed or range from the head service point, but does have significant disadvantages. By creating a regulatory framework that encourages BPL development, the commission is creating an unfair competition to a superior technology, DSL, thereby discouraging its growth. As a potential rural customer of high-speed Internet access, given the choice, I would prefer to have DSL as my access rather than BPL. By encouraging both, the commission may just be guaranteeing that I will get neither.

Sincerely;

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